

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

TANZYBLAND

Plaintiff

v.

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* Civil Action No.: WDO-O2-2223

DIRECT INVESTIGATIVE SERVICES INC.* d/b/a UNIVERSAL DIRECT SECURITY

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Defendant

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MOTION FOR ENTRY OF DEFAULT ~Y THE CLERK

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Plaintiff, Tanzy Bland, by her attorney, Joseph T. Mallon, Jr., pursuant to FRCVP 55(a),
requests the Clerk of this Court to enter default against Defendant, Direct Investigative Services,
Inc. and in support thereof states:

1

Defendant was served with a summons and Complaint on October 17, 2002.

2. Pursuant to FRCVP 12(a), Defendant was required to file a responsive pleading no

later than November 6, 2002.

3. The Defendant has not filed a responsive pleading. (See affidavit of Joseph I. Tivvis,

Jr. attached hereto as exhibit 1).

4. The Defendant is a corporate entity and is not a member of the military .(See

Affidavit of Joseph I. Tivvis, Jr. attached hereto as exhibit 2).

WHEREFORE, for the reasons set forth above and for those reasons set forth in

the Memorandum of Points and Authorities attached hereto, Plaintiff Bland requests that

the Clerk enter default against Defendant, Direct Investigative Services, Inc.

MEMORANDUM OF POINTS AND AUTHORITIES

FRCVP 55(a) states that "[w]hen a party against whom a judgment for affirmative relief

is sought has failed to plead or otherwise defend as provided by these rules and that fact is made

to appear by affidavit or otherwise, the clerk shall enter the party's default."

The defendant, a corporate entity, was served on October 17,2002. FRCVP 12(a)(I)(A)

requires that a defendant serve an answer "within 20 days after being served with the summons

and complaint,..

" More than 20 days have passed since the defendant was served, yet the

defendant has not filed an answer. Therefore, it is appropriate

against the Defendant.

for the Clerk

Joseph T. Mallon, Jr.
Federal Bar No.

22878

MALR.b;N & MCCOOL, LLC
16 Sot!6 Calvert Street, Suite 1002 Baltimore, Maryland 21202
Phone: (410) 727- 7887

to enter a default

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this JL day of May, 2003, a copy of the foregoing

Motion for Entry of Default by Clerk and Memorandum of Points and Authorities were mailed

first-class, postage prepaid, to:

Direct Investigative Services, Inc. d/b/a Universal Direct
Security
6615 Reisterstown Road
Suite 305
Baltimore, Maryland 21215

JOSEPH T. MALLON, JR.